



State of New Jersey

Department of Environmental Protection

Air Quality, Energy and Sustainability

Division of Air Quality

Bureau of Stationary Sources

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RESPONSE TO COMMENTS DOCUMENT

for

An Air Pollution Control Operating Permit Renewal Application (Title V)

for

Joint Base McGuire-Dix-Lakehurst: Lakehurst

RT 547 - BLDG 5

CODE 87 CEG / 787 CES

LAKEHURST, NJ 08733 - 5069

Program Interest (PI) Number: 78897

Permit Activity Number: BOP210001

1/4/22

1/3/22

Douglas J. Bruckman
Environmental Engineer 3
Operating Permits

Date

Joel Leon
Section Chief
Operating Permits

Date

Written comments on the draft approval were received from Joint Base McGuire-Dix-Lakehurst: Lakehurst. Comments were also received from Manchester Township Environmental Commission. Responses to the comments received are addressed in this document.

1. Comment:

Joint Base McGuire-Dix-Lakehurst: Lakehurst commented as follows:

We have identified an item in the draft permit modification for Permit Activity Number: BOP210001, Program Interest Number: 78897 that we would like edited. Compliance plan, Emission Unit U18, Operating Scenario OS4 Reference #5, Laser Cutter in B148. requires a pressure drop between 1- and 8-inches water column (w.c.)

The facility's request is based on the following:

1. The pressure drop requirement was based on permit application numbers, which were based on standard filter numbers.
2. However, after installing the laser cutter and filter system, and obtaining operational instructions from the manufacturer, we now know that the minimum pressure drop for the laser cutter filter should be 0.1 inches w.c.

Response:

The NJDEP does agree that the parameter for the Minimum Operating Pressure Drop (in. H₂O) can be updated from (≥ 1 to ≥ 0.1) based on the operational instructions established by the manufacturer. Therefore, the compliance plan for the U18-OS4 Reference #5 was updated accordingly.

2. Comment:

Manchester Township Environmental Commission Commented as follows:

The Environmental Commission has reviewed the application and would like to note their concern for the air quality in Manchester Township given the significant increases in Sulfur Dioxide and Carbon Dioxide levels, as outlined in the application. As you may be aware, Manchester Township is already considered to be an "Overburdened Community" according to the EPA's Environmental Justice Law.

Response:

Emissions of sulfur dioxide from the boiler are limited to 0.155 tons per year. The increases of sulfur dioxide from modifications proposed in the permit are not considered a significant net

emission increase which is listed in N.J.A.C. 7:27-18 as an increase of 40 tons per year or more. The increases were minimized with use of natural gas and operating hours restrictions. Carbon Dioxide emissions are minimized by the purchase of a boiler with an overall efficiency recognized as a greater percentage fuel energy to steam energy than other boilers which could have been purchased.